

# **EXHIBIT 2**

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

<b>DATE</b>	<b>Description</b>	<b>Time</b>	<b>Rate</b>	<b>Fee</b>
10/29/2019	Spoke to plaintiff, drafted notes	0.4	\$ 500.00	\$ 200.00
10/29/2019	Spoke to plaintiff, drafted notes	0.4	\$ 500.00	\$ 200.00
10/29/2019	Spoke to co-counsel	0.1	\$ 500.00	\$ 50.00
10/29/2019	Spoke to plaintiff, email to plaintiff	0.2	\$ 500.00	\$ 100.00
11/21/2019	Reviewed filings	0.1	\$ 500.00	\$ 50.00
11/22/2019	Spoke to co-counsel	0.1	\$ 500.00	\$ 50.00
11/22/2019	Prepared Pro Hac Vice documents, researched Pro Hac Vice process, ordered certificates of good standing	0.8	\$ 500.00	\$ 400.00
11/22/2019	Conference with co-counsel, called court clerk, conference with co-counsel	0.5	\$ 500.00	\$ 250.00
11/26/2019	Reviewed emails	0.1	\$ 500.00	\$ 50.00
12/2/2019	Spoke to witness, drafted notes, email to witness, scheduled follow-up call	0.4	\$ 500.00	\$ 200.00
12/2/2019	Received and reviewed certificates of good standing	0.1	\$ 500.00	\$ 50.00
12/2/2019	Prepared Pro Hac Vice documents, tried to electronically file	0.4	\$ 500.00	\$ 200.00
12/2/2019	Spoke to witness and his translator several times, drafted declarations	2.5	\$ 500.00	\$ 1,250.00
12/3/2019	Spoke to court clerk, email to clients	0.3	\$ 500.00	\$ 150.00
12/3/2019	Reviewed emails from witness's translator, response email, revised declarations	0.3	\$ 500.00	\$ 150.00
12/3/2019	Spoke to witness and translator, revised declarations, email to co-counsel	0.5	\$ 500.00	\$ 250.00
12/4/2019	Reviewed email, response to co-counsel	0.1	\$ 500.00	\$ 50.00

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12/4/2019	Reviewed email, response to witness, reminder email to co-counsel	0.2	\$ 500.00	\$ 100.00
12/5/2019	Reviewed emails, email to co-counsels	0.1	\$ 500.00	\$ 50.00
12/6/2019	Downloaded filings	0.1	\$ 500.00	\$ 50.00
12/7/2019	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
12/9/2019	Reviewed defendant's filings in opposition to TRO, reviewed release of Parts Authority	0.4	\$ 500.00	\$ 200.00
12/9/2019	Reply to Parts Authority's filings	3.6	\$ 500.00	\$ 1,800.00
12/10/2019	Revised reply to Parts Authority's arguments	1.0	\$ 500.00	\$ 500.00
12/10/2019	Researched and drafted opposition to Diligent's request for a motion to dismiss	1.8	\$ 500.00	\$ 900.00
12/10/2019	Reviewed co-counsel's additions to reply to Parts Authority's opposition to motion for TRO	0.1	\$ 500.00	\$ 50.00
12/10/2019	Reviewed email, response to co-counsel	0.1	\$ 500.00	\$ 50.00
12/13/2019	Reviewed email, response to co-counsel	0.1	\$ 500.00	\$ 50.00
12/13/2019	Strategy conference with co-counsel	0.3	\$ 500.00	\$ 150.00
12/13/2019	Researched and drafted first amended complaint	3.2	\$ 500.00	\$ 1,600.00
12/14/2019	Researched and drafted first amended complaint	4.6	\$ 500.00	\$ 2,300.00
12/14/2019	Drafted first amended complaint, email to co-counsels	0.6	\$ 500.00	\$ 300.00
12/15/2019	Travel to New York for court hearing	2.5	\$ 500.00	\$ 1,250.00
12/16/2019	Downloaded and reviewed filings	0.3	\$ 500.00	\$ 150.00
12/17/2019	Prepared for court hearing	3.0	\$ 500.00	\$ 1,500.00
12/17/2019	Court hearing	1.0	\$ 500.00	\$ 500.00

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12/17/2019	Conference with co-counsel	0.7	\$ 500.00	\$ 350.00
12/17/2019	Travel back to St. Louis	4.0	\$ 500.00	\$ 2,000.00
12/18/2019	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
12/19/2019	Reviewed draft discovery requests	0.8	\$ 500.00	\$ 400.00
12/19/2019	Reviewed draft discovery, email to co-counsel	0.6	\$ 500.00	\$ 300.00
12/23/2019	Reviewed emails regarding discovery requests, downloaded current versions	0.1	\$ 500.00	\$ 50.00
12/24/2019	Reviewed emails, downloaded discovery requests	0.2	\$ 500.00	\$ 100.00
12/26/2019	Drafted stipulation regarding impermissible contacts with plaintiff's attorneys' clients, email to co-counsel	0.4	\$ 500.00	\$ 200.00
12/26/2019	Emailed draft stipulation to defendant's attorneys	0.1	\$ 500.00	\$ 50.00
12/27/2019	Reviewed defendant's proposed stipulation, draft email to opposing attorney, email to co-counsel	0.3	\$ 500.00	\$ 150.00
12/27/2019	Reviewed email from co- counsel, response to opposing attorney regarding stipulation	0.1	\$ 500.00	\$ 50.00
12/30/2019	Reviewed emails, revised draft email to opposing attorney	0.2	\$ 500.00	\$ 100.00
1/2/2020	Conference with co-counsel and opposing attorney regarding possible stipulation, drafted notes, spoke to co-counsel	0.2	\$ 500.00	\$ 100.00
1/2/2020	Edited defendant's proposed stipulation regarding identifying possible plaintiffs, email to co-counsel	0.4	\$ 500.00	\$ 200.00

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1/2/2020	Spoke to co-counsel regarding amended complaint	0.2	\$ 500.00	\$ 100.00
1/3/2020	Reviewed defendants' supplement in opposition to motion for temporary restraining order, reviewed SDNY cases on surreplies filed without leave, email to co-counsel	0.8	\$ 500.00	\$ 400.00
1/3/2020	Reviewed emails from co-counsel, response email	0.2	\$ 500.00	\$ 100.00
1/3/2020	Reviewed email regarding proposed method to resolve TRO dispute, email to co-counsel	0.1	\$ 500.00	\$ 50.00
1/3/2020	Reviewed and revised first amended complaint, looked up cites	3.4	\$ 500.00	\$ 1,700.00
1/7/2020	Reviewed defendant's proposed stipulation	0.1	\$ 500.00	\$ 50.00
1/8/2020	Reviewed edits to defendant's proposed stipulation, emailed thoughts to co-counsel	0.2	\$ 500.00	\$ 100.00
1/8/2020	Conference with co-counsel regarding content of stipulation	0.3	\$ 500.00	\$ 150.00
1/8/2020	Edited draft stipulation	0.2	\$ 500.00	\$ 100.00
1/9/2020	Spoke to co-counsel	0.2	\$ 500.00	\$ 100.00
1/10/2020	Reviewed defendant's emails regarding stipulation language, emailed thoughts to opposing attorney	0.4	\$ 500.00	\$ 200.00
1/10/2020	Reviewed draft response email regarding stipulation, email to co-counsel	0.1	\$ 500.00	\$ 50.00
1/10/2020	Reviewed email regarding stipulation issues	0.1	\$ 500.00	\$ 50.00
1/10/2020	Reviewed draft responses to opposing attorney regarding stipulation, email to co-counsel	0.1	\$ 500.00	\$ 50.00

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1/13/2020	Reviewed email, response to co-counsel regarding stipulation terms	0.1	\$ 500.00	\$ 50.00
1/13/2020	Reviewed emails, draft email regarding stipulation language, response to co-counsel's draft email	0.2	\$ 500.00	\$ 100.00
1/13/2020	Reviewed new draft stipulation, email to co-counsel	0.1	\$ 500.00	\$ 50.00
1/14/2020	Reviewed email from opposing attorney regarding stipulation language	0.1	\$ 500.00	\$ 50.00
1/14/2020	Reviewed emails regarding stipulation language, reviewed working draft of stipulation, email to co-counsel	0.3	\$ 500.00	\$ 150.00
1/14/2020	Reviewed email from co-counsel, response email	0.1	\$ 500.00	\$ 50.00
1/14/2020	Draft letter to court regarding meet and confer efforts	1.8	\$ 500.00	\$ 900.00
1/14/2020	Reviewed email, response to co-counsel	0.1	\$ 500.00	\$ 50.00
1/14/2020	Conference with opposing attorney and co-counsel regarding report to court, drafted notes	0.4	\$ 500.00	\$ 200.00
1/14/2020	Reviewed latest version of report to court regarding stipulation efforts, emails to co-counsels	0.3	\$ 500.00	\$ 150.00
1/15/2020	Reviewed emails, downloaded filings	0.1	\$ 500.00	\$ 50.00
1/15/2020	Reviewed defendant's email regarding arbitration agreement by named plaintiffs, compared to amended complaint	0.2	\$ 500.00	\$ 100.00
1/16/2020	Reviewed court order	0.1	\$ 500.00	\$ 50.00

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1/16/2020	Researched preemption of Arizona claims, emailed research results to co-counsel	1.8	\$ 500.00	\$ 900.00
1/17/2020	Conference with co-counsel, opposing attorney, and court clerk	0.2	\$ 500.00	\$ 100.00
1/17/2020	Researched possible travel for mediation	0.3	\$ 500.00	\$ 150.00
1/17/2020	Spoke to court clerk, recorded scheduling, email to opposing attorney	0.1	\$ 500.00	\$ 50.00
1/17/2020	Reviewed court order, email to co-counsel	0.2	\$ 500.00	\$ 100.00
1/19/2020	Position statement to magistrate judge	1.7	\$ 500.00	\$ 850.00
1/21/2020	Attempted to contact court regarding mediation, researched court requirements, conferenced in for mediation	0.2	\$ 500.00	\$ 100.00
1/21/2020	Mediation with magistrate judge, drafted notes, conference with co-counsel	1.8	\$ 500.00	\$ 900.00
1/21/2020	Reviewed emails, response to co-counsel	0.2	\$ 500.00	\$ 100.00
1/21/2020	Tried to find translator requested by defendants, spoke to named plaintiffs, emailed to co-counsel	0.5	\$ 500.00	\$ 250.00
1/23/2020	Reviewed defendant's pre-motion letter	0.2	\$ 500.00	\$ 100.00
1/23/2020	Reviewed defendant's letter regarding discovery issues	0.1	\$ 500.00	\$ 50.00
1/23/2020	Reviewed draft stipulation, email edits to co-counsel	0.2	\$ 500.00	\$ 100.00
1/23/2020	Reviewed draft no contact form	0.1	\$ 500.00	\$ 50.00
1/23/2020	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
1/23/2020	Conference with co-counsel regarding tasks needed	0.2	\$ 500.00	\$ 100.00

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1/25/2020	Reviewed defendant's edits/comments to stipulation consent/decline form, email to co-counsel	0.1	\$ 500.00	\$ 50.00
1/25/2020	Researched and drafted response to defendant's pre-motion letter	2.1	\$ 500.00	\$ 1,050.00
1/26/2020	Opposition to defendant's second letter motion to dismiss	1.9	\$ 500.00	\$ 950.00
1/26/2020	Opposition to defendant's second letter motion to dismiss	1.2	\$ 500.00	\$ 600.00
1/26/2020	Email to co-counsels explaining remaining jurisdiction issues	0.2	\$ 500.00	\$ 100.00
1/26/2020	Reviewed co-counsel's edits, response to co-counsel	0.1	\$ 500.00	\$ 50.00
1/27/2020	Reviewed email, downloaded stipulation	0.1	\$ 500.00	\$ 50.00
1/28/2020	Reviewed emails, response to co-counsel regarding consensus with stipulation	0.1	\$ 500.00	\$ 50.00
1/29/2020	Reviewed discovery dispute letter, email to co-counsel	0.2	\$ 500.00	\$ 100.00
1/29/2020	Reviewed court order denying motion for TRO as moot, downloaded order based on parties' stipulation	0.1	\$ 500.00	\$ 50.00
1/30/2020	Email to co-counsel	0.1	\$ 500.00	\$ 50.00
1/30/2020	Reviewed and revised opposition to pre-motion letter requiring leave to file motion to dismiss, email to co-counsel	0.6	\$ 500.00	\$ 300.00
1/31/2020	Reviewed emails, downloaded filings	0.1	\$ 500.00	\$ 50.00
1/31/2020	Reviewed emails regarding prior agreement to SDNY venue, researched and drafted response	0.8	\$ 500.00	\$ 400.00



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1/31/2020	Reviewed and revised discovery, searched for supporting case law	1.0	\$ 500.00	\$ 500.00
1/31/2020	Spoke to co-counsel	0.1	\$ 500.00	\$ 50.00
2/3/2020	Reviewed court order, spoke to co-counsel regarding letter to court	0.1	\$ 500.00	\$ 50.00
2/3/2020	Reviewed co-counsel's letter to court, email to co-counsel	0.1	\$ 500.00	\$ 50.00
2/3/2020	Reviewed email, response to co-counsel regarding wording of request for extension	0.1	\$ 500.00	\$ 50.00
2/4/2020	Reviewed letter to court, email to co-counsel	0.1	\$ 500.00	\$ 50.00
2/4/2020	Downloaded and reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
2/6/2020	Reviewed letter regarding motion to stay discovery, recorded scheduling, drafted notes for responses	0.4	\$ 500.00	\$ 200.00
2/6/2020	Spoke to co-counsel regarding defendant's filing	0.1	\$ 500.00	\$ 50.00
2/7/2020	Reviewed email regarding response to motion to stay discovery, emailed thoughts to co-counsel	0.2	\$ 500.00	\$ 100.00
2/8/2020	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
2/11/2020	Reviewed response to pre-motion letter	0.3	\$ 500.00	\$ 150.00
2/13/2020	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
2/14/2020	Prepared for motion argument	1.5	\$ 500.00	\$ 750.00
2/14/2020	Motion to stay argument	0.7	\$ 500.00	\$ 350.00
2/14/2020	Reviewed court order	0.1	\$ 500.00	\$ 50.00
3/4/2020	Email to co-counsel	0.1	\$ 500.00	\$ 50.00
3/6/2020	Reviewed and revised initial disclosures, email to co-counsel	0.5	\$ 500.00	\$ 250.00

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3/6/2020	Reviewed email, response to co-counsel regarding initial disclosures language	0.1	\$ 500.00	\$ 50.00
3/6/2020	Reviewed defendant's initial disclosures	0.1	\$ 500.00	\$ 50.00
3/11/2020	Spoke to co-counsel	0.1	\$ 500.00	\$ 50.00
3/13/2020	Reviewed email regarding information needed from clients, response to co-counsel	0.1	\$ 500.00	\$ 50.00
3/23/2020	Conference with co-counsel, drafted notes	0.4	\$ 500.00	\$ 200.00
3/24/2020	Reviewed email regarding structure of new complaint, email to co-counsel	0.2	\$ 500.00	\$ 100.00
3/24/2020	Called prospective opt-ins to obtain proof of employment, drafted notes, emailed results to co-counsel	1.0	\$ 500.00	\$ 500.00
3/25/2020	Revised and edited draft second amended complaint	1.3	\$ 500.00	\$ 650.00
3/25/2020	Conference and email with co-counsel	0.2	\$ 500.00	\$ 100.00
3/25/2020	Revised and edited draft second amended complaint	1.5	\$ 500.00	\$ 750.00
3/25/2020	Revised and edited draft second amended complaint	1.0	\$ 500.00	\$ 500.00
3/25/2020	Reviewed email from co-counsel regarding second amended complaint language	0.1	\$ 500.00	\$ 50.00
3/26/2020	Reviewed email from co-counsel, response to co-counsel regarding content of second amended complaint	0.1	\$ 500.00	\$ 50.00
3/26/2020	Reviewed co-counsel's email regarding information from possible plaintiffs	0.1	\$ 500.00	\$ 50.00
3/26/2020	Reviewed email regarding content of second amended complaint, response emails	0.2	\$ 500.00	\$ 100.00

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3/26/2020	Reviewed court order and emails regarding status report, recorded scheduling	0.1	\$ 500.00	\$ 50.00
3/26/2020	Reviewed co-counsel's edits to second amended complaint	0.1	\$ 500.00	\$ 50.00
3/27/2020	Reviewed draft status report to court and emails regarding content thereof	0.1	\$ 500.00	\$ 50.00
3/28/2020	Reviewed email and documents regarding named plaintiff	0.1	\$ 500.00	\$ 50.00
3/30/2020	Reviewed emails	0.1	\$ 500.00	\$ 50.00
3/30/2020	Reviewed email from opposing attorney regarding information needed	0.1	\$ 500.00	\$ 50.00
3/30/2020	Reviewed working draft of second amended complaint, emailed edits co-counsel	0.4	\$ 500.00	\$ 200.00
4/3/2020	Reviewed email from opposing attorney	0.1	\$ 500.00	\$ 50.00
4/3/2020	Downloaded defendant's section of letter to court regarding motion to dismiss second amended complaint, preliminarily reviewed	0.2	\$ 500.00	\$ 100.00
4/3/2020	Reviewed and revised response to defendant's letter request to file motion to dismiss	3.3	\$ 500.00	\$ 1,650.00
4/3/2020	Requested publication of supporting decision	0.1	\$ 500.00	\$ 50.00
4/7/2020	Downloaded and skimmed pre-motion letter regarding possible motion to dismiss	0.1	\$ 500.00	\$ 50.00
4/8/2020	Reviewed court order, recorded scheduling	0.2	\$ 500.00	\$ 100.00
4/13/2020	Conference with co-counsel regarding tasks needed	0.2	\$ 500.00	\$ 100.00
4/29/2020	Reviewed new scheduling, spoke to co-counsel regarding initial disclosures	0.2	\$ 500.00	\$ 100.00

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4/29/2020	Reviewed draft amended initial disclosures , emailed approval to co-counsel	0.2	\$ 500.00	\$ 100.00
5/4/2020	Reviewed emails regarding defendant's request for more time to file motion to dismiss, response to co-counsel	0.1	\$ 500.00	\$ 50.00
5/5/2020	Reviewed court order, recorded new scheduling	0.1	\$ 500.00	\$ 50.00
5/6/2020	Spoke to plaintiff, email to co-counsel regarding status	0.1	\$ 500.00	\$ 50.00
5/6/2020	Spoke to plaintiff regarding status	0.1	\$ 500.00	\$ 50.00
5/14/2020	Spoke to co-counsel regarding opposition to motion to dismiss	0.1	\$ 500.00	\$ 50.00
5/17/2020	Prepared opposition to motion to dismiss, drafted personal jurisdiction section	2.9	\$ 500.00	\$ 1,450.00
5/18/2020	Opposition to argumant against standing for multi-state claim	2.0	\$ 500.00	\$ 1,000.00
5/18/2020	Researched opposition to defendant's Twombly arguments in support of its motion to compel	1.0	\$ 500.00	\$ 500.00
5/18/2020	Drafted opposition of motion to dismiss pleading sufficiency arguments	3.8	\$ 500.00	\$ 1,900.00
5/19/2020	Opposition to motion to dismiss, researched response to Twombly/Iqbal arguments	4.8	\$ 500.00	\$ 2,400.00
5/20/2020	Opposition to motion to dismiss, drafted section on sufficiency of pleading "single employer" and "joint employer" relationships	1.8	\$ 500.00	\$ 900.00
5/21/2020	Opposition to motion to dismiss	0.8	\$ 500.00	\$ 400.00
5/21/2020	Opposition to motion to dismiss	0.7	\$ 500.00	\$ 350.00

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5/21/2020	Opposition to motion to dismiss	6.0	\$ 500.00	\$ 3,000.00
5/22/2020	Opposition to motion to dismiss, email to co-counsel	5.2	\$ 500.00	\$ 2,600.00
5/22/2020	Organized documents	0.2	\$ 500.00	\$ 100.00
5/26/2020	Reviewed email from co-counsel regarding new plaintiffs, response to co-counsel	0.1	\$ 500.00	\$ 50.00
6/2/2020	Email to co-counsel regarding joint report	0.1	\$ 500.00	\$ 50.00
6/9/2020	Status conference, recorded scheduling	0.4	\$ 500.00	\$ 200.00
6/9/2020	Conference with co-counsel regarding completion of opposition to motion to dismiss	0.1	\$ 500.00	\$ 50.00
6/9/2020	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
6/9/2020	Email to co-counsel regarding follow-up with discovery issues	0.1	\$ 500.00	\$ 50.00
6/10/2020	Edited, revised, and finalized opposition to motion to dismiss, emailed to co-counsel for filing	6.2	\$ 500.00	\$ 3,100.00
6/11/2020	Reviewed emails, downloaded opposition to motion to dismiss	0.1	\$ 500.00	\$ 50.00
6/24/2020	Reviewed defendant's reply in support of its motion to dismiss second amended complaint	0.3	\$ 500.00	\$ 150.00
6/26/2020	Downloaded Diligent's discovery responses, preliminarily reviewed	0.1	\$ 500.00	\$ 50.00
7/1/2020	Email to co-counsel regarding possible request for hearing on motion to dismiss	0.1	\$ 500.00	\$ 50.00
7/1/2020	Reviewed emails regarding process service on defendant	0.1	\$ 500.00	\$ 50.00

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7/1/2020	Email to co-counsel regarding letter to court regarding oral argument	0.1	\$ 500.00	\$ 50.00
7/1/2020	Email to opposing attorney regarding oral argument	0.1	\$ 500.00	\$ 50.00
7/6/2020	Revised discovery dispute email, email to co-counsel regarding addressing discovery disputes	0.3	\$ 500.00	\$ 150.00
7/6/2020	Drafted template interrogatory responses and objections, email to co-counsel	1.0	\$ 500.00	\$ 500.00
7/6/2020	Incorporated co-counsel's edits into template discovery responses	0.2	\$ 500.00	\$ 100.00
7/6/2020	Worked with plaintiffs on discovery responses	3.8	\$ 500.00	\$ 1,900.00
7/7/2020	Downloaded defendant's documents for discovery, reviewed email from co-counsel regarding documents received	0.2	\$ 500.00	\$ 100.00
7/7/2020	Spoke to plaintiff	0.2	\$ 500.00	\$ 100.00
7/8/2020	Called plaintiff again	0.1	\$ 500.00	\$ 50.00
7/8/2020	Spoke to plaintiff, prepared discovery responses	0.5	\$ 500.00	\$ 250.00
7/10/2020	Reviewed email/questions from defense counsel, prepared draft responses, email to co-counsel	0.4	\$ 500.00	\$ 200.00
7/13/2020	Reviewed email from opposing attorney regarding discovery disputes, reviewed co-counsel's response email	0.2	\$ 500.00	\$ 100.00
7/14/2020	Follow-up efforts on discovery disputes, email to co-counsel	0.2	\$ 500.00	\$ 100.00
7/15/2020	Reviewed discovery dispute emails	0.1	\$ 500.00	\$ 50.00

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7/15/2020	Downloaded Parts Authority's discovery responses	0.1	\$ 500.00	\$ 50.00
7/16/2020	Reviewed email regarding meet and confer call, response to co-counsel	0.1	\$ 500.00	\$ 50.00
7/16/2020	Follow-up calls and emails regarding discovery responses	0.4	\$ 500.00	\$ 200.00
7/16/2020	Organized documents	0.1	\$ 500.00	\$ 50.00
7/17/2020	Follow-up calls and text messages to plaintiffs regarding discovery responses	0.3	\$ 500.00	\$ 150.00
7/17/2020	Strategy conference with co-counsel	0.5	\$ 500.00	\$ 250.00
7/18/2020	Discovery dispute email to opposing attorney, email to co-counsel	1.2	\$ 500.00	\$ 600.00
7/20/2020	Follow-up calls to plaintiff regarding discovery response, drafted notes	0.3	\$ 500.00	\$ 150.00
7/20/2020	Called plaintiff again regarding discovery responses	0.3	\$ 500.00	\$ 150.00
7/21/2020	Reviewed email, checked schedule, email to co-counsel regarding scheduling discovery dispute conference	0.1	\$ 500.00	\$ 50.00
7/21/2020	Attempted to reach plaintiff regarding discovery responses, emailed working drafts with instructions to co-counsel	0.4	\$ 500.00	\$ 200.00
7/22/2020	Revised and sent discovery follow-up email to opposing attorney	0.1	\$ 500.00	\$ 50.00
7/22/2020	Compiled contact information, email to co-counsel	0.2	\$ 500.00	\$ 100.00

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7/26/2020	Prepared for discovery dispute conference, drafted notes for discussion	0.4	\$ 500.00	\$ 200.00
7/27/2020	Prepared for discovery dispute call, discovery dispute call, drafted notes, follow-up emails	2.0	\$ 500.00	\$ 1,000.00
7/27/2020	Downloaded and checked draft discovery responses, email to co-counsel	0.4	\$ 500.00	\$ 200.00
7/27/2020	Drafted request for production responses, email to co-counsel	0.4	\$ 500.00	\$ 200.00
7/27/2020	Helped co-counsel organize and produce discovery responses and production	0.3	\$ 500.00	\$ 150.00
7/27/2020	Reviewed and edited discovery responses	0.3	\$ 500.00	\$ 150.00
7/28/2020	Downloaded final responses to discovery and document production	0.1	\$ 500.00	\$ 50.00
7/28/2020	Reviewed Williams' text message, email to co-counsel	0.3	\$ 500.00	\$ 150.00
7/29/2020	Reviewed ethics of recording discovery dispute call, email to co-counsel	0.3	\$ 500.00	\$ 150.00
7/29/2020	Discovery dispute call, drafted notes	1.3	\$ 500.00	\$ 650.00
7/29/2020	Downloaded audio recording, tested recording	0.1	\$ 500.00	\$ 50.00
8/6/2020	Reviewed email regarding discovery issues	0.1	\$ 500.00	\$ 50.00
8/6/2020	Reviewed email from opposing attorney, email to co-counsel regarding cancelling meet and confer call	0.1	\$ 500.00	\$ 50.00
8/6/2020	Reviewed magistrate's draft protective order, edited document	0.4	\$ 500.00	\$ 200.00



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8/7/2020	Conference with co-counsel regarding draft protective order language	0.2	\$ 500.00	\$ 100.00
8/11/2020	Reviewed discovery dispute emails	0.1	\$ 500.00	\$ 50.00
8/12/2020	Reviewed email regarding discovery status, response to co-counsel	0.1	\$ 500.00	\$ 50.00
8/13/2020	Spoke to named plaintiff regarding status	0.1	\$ 500.00	\$ 50.00
8/13/2020	Reviewed and revised discovery requests	2.0	\$ 500.00	\$ 1,000.00
8/14/2020	Reviewed discovery requests, email to co-counsel	0.3	\$ 500.00	\$ 150.00
8/14/2020	Reviewed draft pre-motion letter regarding discovery issues, researched and supplemented pre-motion letter	1.8	\$ 500.00	\$ 900.00
8/14/2020	Reviewed edits to pre-motion letter, email to co-counsel	0.2	\$ 500.00	\$ 100.00
8/28/2020	Reviewed defendant's response to pre-motion to compel letter	0.1	\$ 500.00	\$ 50.00
9/1/2020	Reviewed court order, recorded scheduling, email to co-counsel covering oral argument on discovery issues	0.1	\$ 500.00	\$ 50.00
9/4/2020	Downloaded discovery requests	0.1	\$ 500.00	\$ 50.00
9/10/2020	Reviewed discovery order	0.2	\$ 500.00	\$ 100.00
9/21/2020	Called and emailed Department of Labor attorney	0.2	\$ 500.00	\$ 100.00
9/23/2020	Strategy conference with co-counsel	0.2	\$ 500.00	\$ 100.00
9/25/2020	Reviewed court order, recorded scheduling	0.3	\$ 500.00	\$ 150.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

9/25/2020	Reviewed email regarding motion to dismiss decision, email to co-counsel regarding ideas to cure	0.2	\$ 500.00	\$ 100.00
9/27/2020	Reviewed email from co-counsel regarding strategy/support for second amended complaint	0.1	\$ 500.00	\$ 50.00
9/28/2020	Downloaded and preliminarily reviewed documents from Department of Labor Arizona case	0.2	\$ 500.00	\$ 100.00
9/30/2020	Collected data to use in letter requesting amendment of complaint	0.8	\$ 500.00	\$ 400.00
10/3/2020	Reviewed email, response to co-counsel regarding new pleading	0.1	\$ 500.00	\$ 50.00
10/12/2020	Reviewed and revised letter regarding leave to amend	1.0	\$ 500.00	\$ 500.00
10/14/2020	Revised letter to magistrate and third amended complaint, email to co-counsel	4.8	\$ 500.00	\$ 2,400.00
10/15/2020	Reviewed draft third amended complaint	0.4	\$ 500.00	\$ 200.00
10/15/2020	Reviewed and revised third amended complaint and letter to court, email to co-counsel	0.8	\$ 500.00	\$ 400.00
10/15/2020	Explained calculations to co-counsel	0.3	\$ 500.00	\$ 150.00
10/15/2020	Reviewed co-counsel's edits to letter to court, email to co-counsel	0.3	\$ 500.00	\$ 150.00
10/16/2020	Reviewed new section of complaint, email to co-counsel	0.1	\$ 500.00	\$ 50.00
10/16/2020	Efforts to check numbers for letter to court and third amended complaint	0.3	\$ 500.00	\$ 150.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

10/27/2020	Reviewed emails and plaintiff's text messages	0.2	\$ 500.00	\$ 100.00
10/28/2020	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
11/5/2020	Reviewed email from opposing attorney	0.1	\$ 500.00	\$ 50.00
11/16/2020	Downloaded defendant's discovery, recorded scheduling, email to co-counsel	0.2	\$ 500.00	\$ 100.00
11/16/2020	Emails regarding conference regarding discovery follow-up and responses	0.1	\$ 500.00	\$ 50.00
11/17/2020	Discussed process service issues with co-counsel	0.1	\$ 500.00	\$ 50.00
11/17/2020	Conference with co-counsel regarding discovery issues	0.4	\$ 500.00	\$ 200.00
11/17/2020	Drafted request for production regarding affirmative defenses, email to co-counsel	0.5	\$ 500.00	\$ 250.00
11/17/2020	Conference with department of labor attorney, email to co-counsel, follow-up email to department of labor	0.6	\$ 500.00	\$ 300.00
11/18/2020	Reviewed email from co-counsel, emailed response to co-counsel regarding scope of claim	0.1	\$ 500.00	\$ 50.00
11/19/2020	Reviewed and revised draft response to defense counsel	0.2	\$ 500.00	\$ 100.00
11/23/2020	Downloaded discovery requests	0.1	\$ 500.00	\$ 50.00
11/23/2020	Downloaded discovery requests	0.1	\$ 500.00	\$ 50.00
11/24/2020	Reviewed defendant's letter requesting to file motion to dismiss third amended complaint	0.2	\$ 500.00	\$ 100.00
11/25/2020	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

12/1/2020	Reviewed emails regarding opposition to motion to dismiss, response to co-counsel	0.1	\$ 500.00	\$ 50.00
12/1/2020	Opposition to pre-motion letter requesting leave to file motion to dismiss third amended complaint	3.0	\$ 500.00	\$ 1,500.00
12/1/2020	Researched and drafted response to pre-motion letter motion to dismiss third amended complaint	3.2	\$ 500.00	\$ 1,600.00
12/2/2020	Reviewed emails, recorded scheduling	0.1	\$ 500.00	\$ 50.00
12/3/2020	Reviewed emails and co-counsel's edits to response to pre-motion letter, researched additional arguments	0.8	\$ 500.00	\$ 400.00
12/4/2020	Reviewed emails regarding opposition to pre-motion letter	0.2	\$ 500.00	\$ 100.00
12/4/2020	Strategy conference with co-counsel	0.3	\$ 500.00	\$ 150.00
12/4/2020	Reviewed defendant's draft status letter to court	0.1	\$ 500.00	\$ 50.00
12/5/2020	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
12/7/2020	Reviewed draft letter report to court, email to co-counsel	0.1	\$ 500.00	\$ 50.00
12/8/2020	Downloaded Parts Authority's supplemental discovery responses and document production, email to opposing attorney	0.2	\$ 500.00	\$ 100.00
12/8/2020	Reviewed court order	0.1	\$ 500.00	\$ 50.00
12/8/2020	Prepared for motion to stay argument	1.2	\$ 500.00	\$ 600.00
12/8/2020	Prepared for discovery dispute call	0.2	\$ 500.00	\$ 100.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

12/8/2020	Prepared for discovery dispute conference, discovery dispute conference, drafted notes	1.3	\$ 500.00	\$ 650.00
12/9/2020	Prepare for motion to stay argument	0.6	\$ 500.00	\$ 300.00
12/9/2020	Motion to stay argument	0.8	\$ 500.00	\$ 400.00
12/10/2020	Reviewed template discovery objections	0.1	\$ 500.00	\$ 50.00
12/10/2020	Reviewed and revised template objections	0.7	\$ 500.00	\$ 350.00
12/11/2020	Reviewed emails, downloaded deposition notices	0.1	\$ 500.00	\$ 50.00
12/21/2020	Downloaded motion to dismiss third amended complaint	0.1	\$ 500.00	\$ 50.00
12/22/2020	Reviewed defendant's motion to dismiss argument on process service, researched issue and possible responses	0.9	\$ 500.00	\$ 450.00
12/22/2020	Emails to co-counsel regarding process service	0.1	\$ 500.00	\$ 50.00
12/22/2020	Drafted argument regarding process service	0.4	\$ 500.00	\$ 200.00
12/22/2020	Opposition to motion to dismiss third amended complaint	1.2	\$ 500.00	\$ 600.00
12/23/2020	Opposition to motion to dismiss third amended complaint	0.2	\$ 500.00	\$ 100.00
12/23/2020	Emails with co-counsel regarding opposition to motion to dismiss	0.1	\$ 500.00	\$ 50.00
12/24/2020	Opposition to motion to dismiss third amended complaint	3.9	\$ 500.00	\$ 1,950.00
12/25/2020	Opposition to motion to dismiss third amended complaint, email to co-counsel	3.7	\$ 500.00	\$ 1,850.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

12/30/2020	Reviewed emails regarding discovery issues	0.1	\$ 500.00	\$ 50.00
12/30/2020	Reviewed questions regarding service, response to co-counsel's office	0.1	\$ 500.00	\$ 50.00
1/4/2021	Conference with co-counsel regarding tasks needed	0.2	\$ 500.00	\$ 100.00
1/4/2021	Conference with co-counsel regarding deposition preparation	0.2	\$ 500.00	\$ 100.00
1/4/2021	Conference with co-counsel regarding mediation availability	0.1	\$ 500.00	\$ 50.00
1/6/2021	Reviewed email from opposing attorney regarding discovery disputes	0.1	\$ 500.00	\$ 50.00
1/6/2021	Reviewed mediation dates, response to co-counsel	0.1	\$ 500.00	\$ 50.00
1/7/2021	Reviewed email regarding deposition scheduling	0.1	\$ 500.00	\$ 50.00
1/9/2021	Downloaded and reviewed request for extension	0.1	\$ 500.00	\$ 50.00
1/9/2021	Reviewed email, downloaded deposition notices	0.1	\$ 500.00	\$ 50.00
1/12/2021	Reviewed emails regarding method of service, response to co-counsel	0.2	\$ 500.00	\$ 100.00
1/12/2021	Conference with co-counsel regarding mediation strategy	0.1	\$ 500.00	\$ 50.00
1/14/2021	Assisted co-counsel with deposition preparation	0.2	\$ 500.00	\$ 100.00
1/21/2021	Reviewed forms from mediation service	0.1	\$ 500.00	\$ 50.00
1/21/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
1/21/2021	Spoke to co-counsel regarding preparation for mediation	0.2	\$ 500.00	\$ 100.00
1/27/2021	Reviewed emails regarding mediation preparation	0.1	\$ 500.00	\$ 50.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

1/27/2021	Reviewed co-counsel's outline of mediation brief, response to co-counsel	0.1	\$ 500.00	\$ 50.00
1/27/2021	Reviewed email, response to co-counsel regarding tasks needed for mediation brief	0.1	\$ 500.00	\$ 50.00
1/27/2021	Drafted section of mediation brief on defendant's inability to compel arbitration under Ritmann v. Amazon	0.9	\$ 500.00	\$ 450.00
1/28/2021	Located source of evidence, email to co-counsel	0.2	\$ 500.00	\$ 100.00
1/28/2021	Emails with co-counsel regarding mediation brief content	0.2	\$ 500.00	\$ 100.00
1/28/2021	Response to co-counsel regarding mediation brief	0.1	\$ 500.00	\$ 50.00
1/28/2021	Conference with co-counsel	0.2	\$ 500.00	\$ 100.00
1/28/2021	Reviewed and revised mediation brief	0.9	\$ 500.00	\$ 450.00
2/1/2021	Reviewed email, response regarding call with mediator	0.1	\$ 500.00	\$ 50.00
2/1/2021	Conference with mediator	0.2	\$ 500.00	\$ 100.00
2/1/2021	Signed mediation contract, email to co-counsel	0.1	\$ 500.00	\$ 50.00
2/2/2021	Prepared for mediation	0.2	\$ 500.00	\$ 100.00
2/2/2021	Mediation	8.1	\$ 500.00	\$ 4,050.00
2/4/2021	Reviewed draft status letter to court, email to co-counsel	0.1	\$ 500.00	\$ 50.00
2/4/2021	Conference with co-counsel regarding responses to settlement offer	0.7	\$ 500.00	\$ 350.00
2/4/2021	Gathered data for further negotiations	2.2	\$ 500.00	\$ 1,100.00
2/8/2021	Conference with court regarding status and discovery issues, drafted notes	0.4	\$ 500.00	\$ 200.00
2/8/2021	Looked into discovery issues	0.2	\$ 500.00	\$ 100.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

2/8/2021	Reviewed prior discovery responses, email to co-counsel regarding supplementation needed	0.2	\$ 500.00	\$ 100.00
2/15/2021	Reviewed and edited opposition to motion to dismiss third amended claim	1.1	\$ 500.00	\$ 550.00
2/16/2021	Downloaded and reviewed filings	0.2	\$ 500.00	\$ 100.00
2/16/2021	Conference with co-counsel	0.1	\$ 500.00	\$ 50.00
2/17/2021	Reviewed settlement emails	0.1	\$ 500.00	\$ 50.00
2/19/2021	Reviewed email, checked prior notes, emailed information regarding possible class member to co-counsel	0.2	\$ 500.00	\$ 100.00
2/19/2021	Reviewed request for extension	0.1	\$ 500.00	\$ 50.00
2/23/2021	Reviewed reply in support of motion to dismiss	0.2	\$ 500.00	\$ 100.00
3/4/2021	Reviewed email, response to co-counsel regarding discovery of tax returns, researched further authority	0.4	\$ 500.00	\$ 200.00
3/4/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
4/5/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
4/6/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
4/9/2021	Conference with co-counsel regarding personal jurisdiction discovery needed	0.2	\$ 500.00	\$ 100.00
4/9/2021	Reviewed deposition transcript to plan personal jurisdiction discovery	0.5	\$ 500.00	\$ 250.00
4/9/2021	Reviewed deposition transcript to plan personal jurisdiction discovery	0.2	\$ 500.00	\$ 100.00
4/9/2021	Researched connection between Diligent entities	1.0	\$ 500.00	\$ 500.00



**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

4/9/2021	Reviewed deposition transcript to prepare for personal jurisdiction discovery	1.4	\$ 500.00	\$ 700.00
4/11/2021	Researched factual bases for personal jurisdiction over Larry Browne, compiled evidence, email to co-counsel	3.4	\$ 500.00	\$ 1,700.00
4/12/2021	Reviewed email and proposed order on jurisdictional discovery	0.1	\$ 500.00	\$ 50.00
4/12/2021	Reviewed email regarding jurisdictional discovery	0.1	\$ 500.00	\$ 50.00
4/12/2021	Reviewed proposed scheduling plan	0.1	\$ 500.00	\$ 50.00
4/13/2021	Strategy conference with co-counsel	0.2	\$ 500.00	\$ 100.00
4/13/2021	Reviewed, edited, and supplemented discovery request /deposition notice	0.6	\$ 500.00	\$ 300.00
4/13/2021	Worked with co-counsel on jurisdictional discovery requests	0.1	\$ 500.00	\$ 50.00
4/13/2021	Reviewed and edited discovery requests	0.3	\$ 500.00	\$ 150.00
4/14/2021	Downloaded plaintiffs jurisdictional discovery requests	0.1	\$ 500.00	\$ 50.00
4/14/2021	Reviewed court order regarding jurisdictional discovery, recorded scheduling	0.1	\$ 500.00	\$ 50.00
4/20/2021	Emailed ideas to co-counsel regarding limiting jurisdictional discovery	0.6	\$ 500.00	\$ 300.00
4/20/2021	Reviewed draft status letter to magistrate	0.1	\$ 500.00	\$ 50.00
4/21/2021	Preliminarily reviewed defendant's discovery dispute email	0.1	\$ 500.00	\$ 50.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

4/21/2021	Reviewed email regarding discovery disputes, suggested response to co-counsel	0.2	\$ 500.00	\$ 100.00
4/22/2021	Reviewed emails regarding scope of jurisdictional discovery	0.1	\$ 500.00	\$ 50.00
4/22/2021	Reviewed emails regarding discovery issues/deadlines	0.1	\$ 500.00	\$ 50.00
4/23/2021	Reviewed email from opposing attorney regarding jurisdictional discovery disputes	0.1	\$ 500.00	\$ 50.00
4/23/2021	Downloaded defendant's letter brief regarding jurisdictional discovery, preliminarily reviewed it	0.1	\$ 500.00	\$ 50.00
4/23/2021	Reviewed discovery issues with co-counsel, planned response to letter motion on discovery scope	0.3	\$ 500.00	\$ 150.00
4/23/2021	Edited discovery compromise email, forwarded to co-counsel	0.2	\$ 500.00	\$ 100.00
4/24/2021	Researched and drafted opposition to defendant's letter motion seeking to narrow scope of discovery	1.5	\$ 500.00	\$ 750.00
4/24/2021	Researched and drafted opposition to defendant's letter motion seeking to narrow scope of jurisdictional discovery, email to co-counsel	0.9	\$ 500.00	\$ 450.00
4/25/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
4/26/2021	Reviewed co-counsel's response to opposition letter brief on scope of jurisdictional discovery, reviewed co-counsel's edits	0.2	\$ 500.00	\$ 100.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

4/27/2021	Reviewed email from opposing attorney, updated draft opposition to letter	0.4	\$ 500.00	\$ 200.00
4/27/2021	Finalized and electronically filed response to defendant's letter regarding scope of jurisdictional discovery	0.4	\$ 500.00	\$ 200.00
4/27/2021	Prepared for discovery dispute hearing	0.3	\$ 500.00	\$ 150.00
4/28/2021	Prepared for discovery dispute hearing	1.0	\$ 500.00	\$ 500.00
4/28/2021	Discovery dispute hearing, drafted notes	1.6	\$ 500.00	\$ 800.00
4/28/2021	Conference with co-counsel	0.1	\$ 500.00	\$ 50.00
4/29/2021	Reviewed court order on scope of jurisdictional discovery	0.1	\$ 500.00	\$ 50.00
5/3/2021	Downloaded and preliminarily reviewed defendant's request for production responses and documents	0.2	\$ 500.00	\$ 100.00
5/4/2021	Organized documents for R30(b)(6) deposition	0.1	\$ 500.00	\$ 50.00
5/4/2021	Reviewed defendant's request for proposal responses and document production, compared to court order, drafted notes	0.3	\$ 500.00	\$ 150.00
5/4/2021	Prepared new R30(b)(6) deposition notice, email to co-counsel	0.3	\$ 500.00	\$ 150.00
5/4/2021	Conference with co-counsel regarding discovery responses and tasks needed	0.2	\$ 500.00	\$ 100.00
5/4/2021	Reviewed email from defense attorney regarding R30(b)(6) topics and time length, response to opposing attorney	0.1	\$ 500.00	\$ 50.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

5/6/2021	Reviewed email, response to opposing attorney regarding deposition scheduling	0.1	\$ 500.00	\$ 50.00
5/6/2021	Finalized and reviewed deposition notice, email to court reporter	0.2	\$ 500.00	\$ 100.00
5/7/2021	Downloaded and shared Zoom link for deposition	0.1	\$ 500.00	\$ 50.00
5/7/2021	Researched corporate connections among defendants	1.5	\$ 500.00	\$ 750.00
5/7/2021	Drafted table of evidence supporting single employer status	0.8	\$ 500.00	\$ 400.00
5/7/2021	Researched personal jurisdiction based on single employer status in Second Circuit	2.2	\$ 500.00	\$ 1,100.00
5/7/2021	Reviewed opposing attorney's email regarding scope of R30(b)(6) deposition, reviewed court order and prior deposition notice, email response to opposing attorney	0.3	\$ 500.00	\$ 150.00
5/10/2021	Reviewed defendant's discovery responses	0.1	\$ 500.00	\$ 50.00
5/10/2021	Follow-up email to opposing attorney regarding deponent's identity	0.1	\$ 500.00	\$ 50.00
5/11/2021	Downloaded deposition exhibits	0.1	\$ 500.00	\$ 50.00
5/11/2021	Prepared for R30(b)(6) deposition on personal jurisdiction issues	2.2	\$ 500.00	\$ 1,100.00
5/11/2021	Email to co-counsel regarding deposition preparation and ideas	0.1	\$ 500.00	\$ 50.00
5/12/2021	Prepared for jurisdictional discovery R30(b)(6) deposition	1.0	\$ 500.00	\$ 500.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

5/12/2021	Began supplemental brief on personal jurisdiction	1.6	\$ 500.00	\$ 800.00
5/13/2021	Prepared for R30(b)(6) deposition	0.5	\$ 500.00	\$ 250.00
5/13/2021	Reviewed and incorporated co-counsel's additions to R30(b)(6) outline	0.2	\$ 500.00	\$ 100.00
5/13/2021	Identified and compiled exhibits to serve on opposing attorney	0.5	\$ 500.00	\$ 250.00
5/13/2021	Emails with court reporter	0.1	\$ 500.00	\$ 50.00
5/13/2021	Prepared for R30(b)(6) deposition	0.9	\$ 500.00	\$ 450.00
5/14/2021	Prepared for R30(b)(6) deposition	0.7	\$ 500.00	\$ 350.00
5/14/2021	Prepared for R30(b)(6) deposition	1.7	\$ 500.00	\$ 850.00
5/14/2021	Supplemented brief on personal jurisdiction	0.8	\$ 500.00	\$ 400.00
5/15/2021	Supplemented brief on personal jurisdiction	0.8	\$ 500.00	\$ 400.00
5/16/2021	Downloaded deposition transcript and exhibits	0.1	\$ 500.00	\$ 50.00
5/16/2021	Reviewed R30(b)(6) deposition, drafted notes, supplemented brief on personal jurisdiction from depo testimony	2.8	\$ 500.00	\$ 1,400.00
5/17/2021	Revised and enhanced supplemental brief on personal jurisdiction	1.0	\$ 500.00	\$ 500.00
5/20/2021	Reviewed co-counsel's edits to supplemental brief on personal jurisdiction, reviewed evidence of frequency of contacts	0.4	\$ 500.00	\$ 200.00
5/20/2021	Researched new argument for supplemental brief	0.6	\$ 500.00	\$ 300.00
5/20/2021	Reviewed, revised, and finalized supplemental brief, compiled and referenced exhibits	2.0	\$ 500.00	\$ 1,000.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

5/20/2021	Finalized supplemental brief, prepared exhibits	1.0	\$ 500.00	\$ 500.00
5/21/2021	Finalized exhibits, electronic case filing	0.8	\$ 500.00	\$ 400.00
5/27/2021	Reviewed deponent's errata sheet	0.1	\$ 500.00	\$ 50.00
5/28/2021	Reviewed defendant's supplemental brief	0.2	\$ 500.00	\$ 100.00
6/30/2021	Reviewed email, preliminarily reviewed draft discovery responses	0.1	\$ 500.00	\$ 50.00
7/2/2021	Reviewed ruling on motion to dismiss	0.2	\$ 500.00	\$ 100.00
7/2/2021	Reviewed emails regarding brainstorming/strategy	0.1	\$ 500.00	\$ 50.00
7/6/2021	Reviewed discovery dispute letter regarding R30(b)(6) deposition, email to co-counsel	0.1	\$ 500.00	\$ 50.00
7/9/2021	Reviewed email regarding meet and confer issues/R30(b)(6) witness preparation	0.1	\$ 500.00	\$ 50.00
7/10/2021	Reviewed deposition notice, planned for deposition, email to co-counsel	0.2	\$ 500.00	\$ 100.00
7/12/2021	Conference with co-counsel regarding discovery responses and deposition scheduling/coverage	0.2	\$ 500.00	\$ 100.00
7/12/2021	Reviewed email regarding deponents' availability	0.1	\$ 500.00	\$ 50.00
7/13/2021	Reviewed email, response to co-counsel regarding meet and confer efforts	0.1	\$ 500.00	\$ 50.00
7/20/2021	Preliminarily researched Parts Authority's request for separate depositions	0.3	\$ 500.00	\$ 150.00
7/20/2021	Conference with co-counsel regarding deposition scheduling/defendant's requests	0.3	\$ 500.00	\$ 150.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

7/21/2021	Reviewed impact of Arizona motion to dismiss order, drafted summary impact/recommendations memo/email	1.0	\$ 500.00	\$ 500.00
7/20/2021	Reviewed co-counsel's notes, response to co-counsel	0.1	\$ 500.00	\$ 50.00
7/22/2021	Reviewed emails, checked need for interpreter, response to defense counsel	0.1	\$ 500.00	\$ 50.00
7/22/2021	Reviewed emails regarding R30(b)(6) issues	0.1	\$ 500.00	\$ 50.00
7/30/2021	Strategy conference with co-counsel	0.2	\$ 500.00	\$ 100.00
7/30/2021	Reviewed draft email regarding deposition scheduling	0.1	\$ 500.00	\$ 50.00
8/5/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
8/10/2021	Scanned defendant's discovery dispute letter	0.1	\$ 500.00	\$ 50.00
8/13/2021	Strategy conference with co-counsel	0.2	\$ 500.00	\$ 100.00
8/13/2021	Reviewed and revised status letter to court	0.4	\$ 500.00	\$ 200.00
8/13/2021	Reviewed cover email to co-counsel	0.1	\$ 500.00	\$ 50.00
8/19/2021	Reviewed draft status letter to court, email to co-counsel	0.1	\$ 500.00	\$ 50.00
8/22/2021	Strategy conference with co-counsel	0.3	\$ 500.00	\$ 150.00
8/23/2021	Conference with court regarding discovery and scheduling issues, drafted notes	0.7	\$ 500.00	\$ 350.00
8/23/2021	Reviewed draft email to opposing attorney	0.1	\$ 500.00	\$ 50.00
8/24/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

8/27/2021	Conference with co-counsel regarding search terms and tasks needed	0.2	\$ 500.00	\$ 100.00
8/27/2021	Reviewed search terms, email to co-counsel	0.3	\$ 500.00	\$ 150.00
8/27/2021	Reviewed omnibus follow-up email to defense counsel	0.1	\$ 500.00	\$ 50.00
8/31/2021	Reviewed letter from defendant to court regarding suggested next steps	0.1	\$ 500.00	\$ 50.00
9/8/2021	Strategy emails with co-counsel	0.1	\$ 500.00	\$ 50.00
9/8/2021	Reviewed court order, strategy email to co-counsel	0.4	\$ 500.00	\$ 200.00
9/8/2021	Strategy conference with co-counsel, drafted notes	0.2	\$ 500.00	\$ 100.00
9/8/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
9/8/2021	Researched options for response to court order	0.8	\$ 500.00	\$ 400.00
9/8/2021	Strategy emails with co-counsel	0.1	\$ 500.00	\$ 50.00
9/9/2021	Reviewed emails regarding tasks needed	0.1	\$ 500.00	\$ 50.00
9/9/2021	Email to co-counsel regarding pros and cons of transfer back to District of Arizona	0.1	\$ 500.00	\$ 50.00
9/9/2021	Reviewed court filings	0.1	\$ 500.00	\$ 50.00
9/9/2021	Researched ability to bring Arizona state claim, email to co-counsel	0.5	\$ 500.00	\$ 250.00
9/9/2021	Spoke to co-counsel regarding options	0.2	\$ 500.00	\$ 100.00
9/13/2021	Reviewed documents relevant to transfer back to District of Arizona	0.3	\$ 500.00	\$ 150.00
9/13/2021	Drafted letter to court regarding possible transfer back to District of Arizona	0.4	\$ 500.00	\$ 200.00
9/13/2021	Researched and drafted letter to SDNY	1.4	\$ 500.00	\$ 700.00



**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

9/13/2021	Conference with co-counsel regarding settlement	0.1	\$ 500.00	\$ 50.00
9/13/2021	Researched authority for letter to court	0.5	\$ 500.00	\$ 250.00
9/13/2021	Reviewed and revised letter to court regarding Cyprian transfer issue	0.3	\$ 500.00	\$ 150.00
9/15/2021	Strategy conference with co-counsel	0.4	\$ 500.00	\$ 200.00
9/16/2021	Conference with client	0.2	\$ 500.00	\$ 100.00
9/16/2021	Email proposing settlement to opposing attorney	0.2	\$ 500.00	\$ 100.00
9/17/2021	Reviewed email, recorded Scheduling	0.1	\$ 500.00	\$ 50.00
9/17/2021	Email with opposing attorney regarding settlement terms	0.3	\$ 500.00	\$ 150.00
9/20/2021	Meet and confer call, drafted notes	1.0	\$ 500.00	\$ 500.00
9/22/2021	Discovery dispute call, drafted notes	0.7	\$ 500.00	\$ 350.00
9/30/2021	Reviewed draft letter to court regarding rescheduling hearing	0.1	\$ 500.00	\$ 50.00
10/2/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
10/4/2021	Reviewed email regarding tasks needed, response to co-counsel	0.1	\$ 500.00	\$ 50.00
10/6/2021	Strategy conference with co-counsel regarding discovery issues	0.2	\$ 500.00	\$ 100.00
10/6/2021	Prepared for discovery meet and confer call	0.6	\$ 500.00	\$ 300.00
10/6/2021	Discovery meet and confer call, drafted notes	0.8	\$ 500.00	\$ 400.00
10/14/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
10/15/2021	Strategy conference with co-counsel	0.3	\$ 500.00	\$ 150.00
10/15/2021	Settlement email to opposing attorney	0.1	\$ 500.00	\$ 50.00
10/17/2021	Efforts to cover deposition	0.4	\$ 500.00	\$ 200.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

10/20/2021	Emails regarding settlement	0.1	\$ 500.00	\$ 50.00
10/20/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
10/21/2021	Spoke to co-counsel regarding deposition issue	0.1	\$ 500.00	\$ 50.00
10/22/2021	Settlement email to opposing attorney	0.1	\$ 500.00	\$ 50.00
10/22/2021	Phone conference with opposing attorney regarding settlement numbers, email to co-counsel	0.2	\$ 500.00	\$ 100.00
10/22/2021	Prepped to prepare plaintiff for deposition	3.6	\$ 500.00	\$ 1,800.00
10/23/2021	Prepped deponent	1.0	\$ 500.00	\$ 500.00
10/23/2021	Reviewed deponent's documents	0.2	\$ 500.00	\$ 100.00
10/25/2021	Called plaintiff to obtain evidence	0.1	\$ 500.00	\$ 50.00
10/29/2021	Called plaintiff regarding document productions	0.1	\$ 500.00	\$ 50.00
10/30/2021	Tried to reach plaintiff for deposition preparation	0.2	\$ 500.00	\$ 100.00
10/30/2021	Email to co-counsel regarding settlement	0.1	\$ 500.00	\$ 50.00
10/30/2021	Spoke to plaintiff, scheduled deposition preparation	0.1	\$ 500.00	\$ 50.00
10/30/2021	Prepared for deposition preparation	0.4	\$ 500.00	\$ 200.00
10/31/2021	Prepared for deposition preparation	0.1	\$ 500.00	\$ 50.00
10/31/2021	Tried to reach plaintiff for deposition preparation	0.2	\$ 500.00	\$ 100.00
10/31/2021	Deposition preparation	0.7	\$ 500.00	\$ 350.00
11/1/2021	Emails to plaintiff and opposing attorney regarding deposition	0.1	\$ 500.00	\$ 50.00
11/1/2021	Reviewed email from plaintiff, spoke to plaintiff regarding need to appear for deposition	0.2	\$ 500.00	\$ 100.00
11/1/2021	Efforts to reschedule deposition	0.4	\$ 500.00	\$ 200.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

11/1/2021	Strategy conference with co-counsel	0.2	\$ 500.00	\$ 100.00
11/2/2021	Reviewed emails, efforts to reschedule deposition	0.2	\$ 500.00	\$ 100.00
11/3/2021	Called plaintiff regarding deposition	0.1	\$ 500.00	\$ 50.00
11/3/2021	Strategy conference	0.3	\$ 500.00	\$ 150.00
11/3/2021	Called deponent	0.1	\$ 500.00	\$ 50.00
11/4/2021	Discovery conference with court, drafted notes	1.6	\$ 500.00	\$ 800.00
11/4/2021	Spoke to opposing attorney, drafted notes, emails to co-counsel	0.2	\$ 500.00	\$ 100.00
11/5/2021	Reviewed court order, recorded scheduling	0.1	\$ 500.00	\$ 50.00
11/8/2021	Called Heneo and M. Williams again regarding deposition scheduling	0.1	\$ 500.00	\$ 50.00
11/8/2021	Emails with co-counsel regarding deposition scheduling	0.2	\$ 500.00	\$ 100.00
11/8/2021	Quick review of ESI protocol, cmail to co-counsel	0.2	\$ 500.00	\$ 100.00
11/9/2021	Strategy conference with co-counsel	0.3	\$ 500.00	\$ 150.00
11/11/2021	Draft settlement email	0.1	\$ 500.00	\$ 50.00
11/11/2021	Effort to settle claim	0.3	\$ 500.00	\$ 150.00
11/11/2021	Reviewed email from opposing attorney, response email	0.2	\$ 500.00	\$ 100.00
11/11/2021	Sent revised settlement demand	0.2	\$ 500.00	\$ 100.00
11/11/2021	Conference with co-counsel, efforts to settle case	0.4	\$ 500.00	\$ 200.00
11/11/2021	Settlement email to opposing attorney	0.1	\$ 500.00	\$ 50.00
11/15/2021	Reviewed draft response email to opposing attorney	0.1	\$ 500.00	\$ 50.00
1/11/2022	Reviewed checks transmittal letter, email to co-counsel	0.3	\$ 500.00	\$ 150.00

**HENAO V. PARTS AUTHORITY****MARK POTASHNICK TIME ENTRIES**

1/11/2022	Reviewed proposed order, email to co-counsel	0.1	\$ 500.00	\$ 50.00
1/12/2022	Reviewed edits to checks transmittal letter	0.1	\$ 500.00	\$ 50.00
1/20/2022	Strategy conference with co- counsel	0.2	\$ 500.00	\$ 100.00
1/20/2022	Reviewed checks letter, email to co-counsel	0.2	\$ 500.00	\$ 100.00
		275.7		\$ 137,850.00